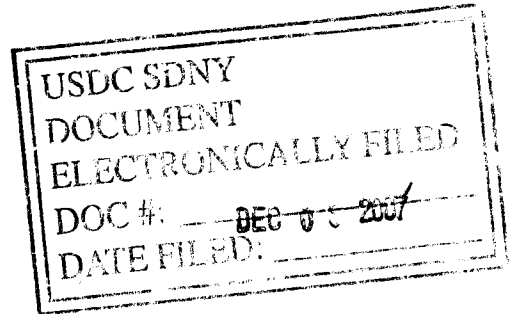


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
ALLAN ALCANTARA, :
:
Defendant. :
- - - - -X

INFORMATION

S1 07 Cr. 660 (JGK)



COUNT ONE

The United States Attorney charges:

1. From in or about 2004 through on or about March 9, 2007, in the Southern District of New York and elsewhere, ALLAN ALCANTARA, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ALLAN ALCANTARA, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 1 kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

COUNT TWO

The United States Attorney further charges:

3. From in or about 2004 through on or about March 9,

2007, in the Southern District of New York and elsewhere, ALLAN ALCANTARA, the defendant, and others known and unknown, unlawfully, wilfully and knowingly did combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).

4. It was a part and an object of the money laundering conspiracy that ALLAN ALCANTARA, the defendant, and co-conspirators not named as defendants herein, in an offense involving and affecting interstate and foreign commerce, knowing that property involved in financial transactions represented the proceeds of some form of unlawful activity, to wit, hundreds of thousands of dollars of United States currency, unlawfully, wilfully, and knowingly would and did conduct and attempt to conduct financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h).)

FIRST FORFEITURE ALLEGATION

5. As a result of committing the narcotics offense charged in Counts One of this Information, in violation of Sections 812, 841(a)(1), 841(b)(1)(A) and 846 of Title 21, United States

Code, ALLAN ALCANTARA, the defendant, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of said violations, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One of this Information, including but not limited to (1) a sum of money that constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of the offense in Count One and; (2) a 2001 Ford Explorer with VIN 1FMYU70E41UA02996.

Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(i) cannot be located upon the exercise of due diligence;

(ii) has been transferred or sold to, or deposited with, a third party;

(iii) has been placed beyond the jurisdiction of the court;

(iv) has been substantially diminished in value;
or

(v) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C.

§ 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

(Title 21, United States Code, Sections 841(a)(1) and 853.)

SECOND FORFEITURE ALLEGATION

7. As the result of committing the money laundering offense in violation of Title 18, United States Code, Section 1956, alleged in Count Two of this Information, ALLAN ALCANTARA, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offense and all property traceable to such property, including but not limited to: (1) a sum of money that constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of the offense in Count Two and; (2) a 2001 Ford Explorer with VIN 1FMYU70E41UA02996.

Substitute Asset Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;


(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or
(e) has been commingled with other property which
cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. §
982(b), to seek forfeiture of any other property of the defendant
up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ALLAN ALCANTARA,

Defendant.

INFORMATION

S1 07 Cr. 660 (JGK)
(Title 21, United States Code,
Section 846. Title 18, United States
Code, Section 1956.)